

# **Exhibit 2**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**PLAINTIFFS' SECOND SUPPLEMENTAL DAMAGES DISCLOSURES**

Pursuant to the Court's Order of December 9, 2011, the Plaintiffs, by and through counsel, submit the following "categories of intangible damages for each Plaintiff, and calculations for Plaintiffs' economic damages to Defendants." DE 171 at 2.

**A. Categories of Intangible Damages**

The Plaintiffs seek the following categories of intangible damages:

**The Decedents**

The estates of all the decedents seek damages for the physical pain and suffering and the emotional and mental pain, grief, anguish and distress suffered by the decedents from the moment of the bombings until they permanently lost consciousness prior to their deaths.

**Plaintiffs Who Suffered Physical Injuries**

Plaintiffs Mark Sokolow, Rena Sokolow, Jamie Sokolow, Lauren Sokolow, Shayna Gould, Shmuel Waldman, Alan J. Bauer, Yehonathon Bauer, Shaul Mandelkorn and Oz Joseph Guetta seek damages for the physical pain and suffering; physical disabilities and disfigurement; emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or

will suffer, in the past, present and future, as a result of the respective terrorist attacks in which they were physically injured and as a result of those physical injuries.

Plaintiffs Who Suffered/Also Suffered Non-Physical Injuries

1. Plaintiff Mark Sokolow also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that he suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Rena Sokolow, Jamie Sokolow and Lauren Sokolow and the injuries caused to them thereby.

2. Plaintiff Rena Sokolow also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Mark Sokolow, Jamie Sokolow and Lauren Sokolow and the injuries caused to them thereby.

3. Plaintiff Jamie Sokolow also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Rena Sokolow, Mark Sokolow and Lauren Sokolow and the injuries caused to them thereby.

4. Plaintiff Lauren Sokolow also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Rena Sokolow, Mark Sokolow and Jamie Sokolow and the injuries caused to them thereby.

5. Plaintiff Elana Sokolow seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Rena Sokolow, Mark Sokolow, Lauren Sokolow and Jamie Sokolow and the injuries caused to them thereby.

6. Plaintiffs Ronald A. Gould, Elise J. Gould and Jessica Rine seek damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or will suffer, in the past, present and future, as a result of the terrorist attack on Shayna E. Gould and the injuries caused to her thereby.

7. Plaintiffs Henna N. Waldman, Morris Waldman and Eva Waldman seek damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or will suffer, in the past, present and future, as a result of the terrorist attack on Shmuel Waldman and the injuries caused to him thereby.

8. Plaintiff Dr. Alan J. Bauer also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that he suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Yehonathon Bauer and the injuries caused to him thereby.

9. Plaintiff Yehonathon Bauer also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that he suffered, suffers or will suffer, in the past,

present and future, as a result of the terrorist attack on Dr. Alan J. Bauer and the injuries caused to him thereby.

10. Plaintiffs Revital Bauer, Binyamin Bauer, Daniel Bauer and Yehuda Bauer seek damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or will suffer, in the past, present and future, as a result of the terrorist attack on Dr. Alan J. Bauer and Yehonathon Bauer and the injuries caused to them thereby.

11. Plaintiffs Leonard Mandelkorn and Nurit Mandelkorn seek damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or will suffer, in the past, present and future, as a result of the terrorist attack on Shaul Mandelkorn and the injuries caused to him thereby.

12. Plaintiff Oz Joseph Guetta also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that he suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on Varda Guetta and the injuries caused to her thereby.

13. Plaintiff Varda Guetta seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and future, as a result of the terrorist attack on her.

14. Plaintiff Varda Guetta also seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that she suffered, suffers or will suffer, in the past, present and

future, as a result of the terrorist attack on Oz Joseph Guetta and the injuries caused to him thereby.

15. Plaintiffs Robert L. Coulter Sr., Dianne Coulter Miller, Robert L. Coulter Jr., Dr. Larry Carter, Shaun Coffel, Dr. Richard Blutstein, Dr. Katherine Baker, Rebekah Blutstein, Norman Gritz, Nevenka Gritz, Karen Goldberg, Chana B. Goldberg, Esther Z. Goldberg, Yitzhak S. Goldberg, Shoshana M. Goldberg, Eliezer S. Goldberg, Yaakov M. Goldberg and Tzvi Y. Goldberg seeks damages for the emotional and mental pain, grief, anguish and distress; psychological injury, trauma and disabilities; and loss of consortium, society, guidance and solatium, that they suffered, suffer or will suffer, in the past, present and future, as a result of the terrorist attack on their respective decedents and the murder of their decedents therein.

#### **B. Calculations for Plaintiffs' Economic Damages**

As reflected in the chart below, most of the Plaintiffs do not have or have waived claims for economic damages (designated by "N/A") and calculations of the remaining claims for economic damages cannot be made without expert analysis (designated by "Expert"). *See Kingsway Financial Services v. Pricewaterhouse-Coopers*, 2006 WL 1520227 at \* 1 (S.D.N.Y. 2006) ("Where ... plaintiff's damages are not the product of a simple mathematical calculation and require expert testimony, the damages calculations need not be produced with the plaintiff's Rule 26(a)(1) disclosures and may be produced as part of the party's Rule 26(a)(2) disclosures."); *Pine Ridge Recycling v. Butts County, Ga.*, 889 F.Supp. 1526, 1527 (M.D.Ga. 1995) ("Arguments over the method of computation are similarly premature since the method will necessitate expert testimony, which is not due until later this year.").

<b>Types of Damages</b>  <b>Plaintiffs</b>	<b>Loss of Past Income</b>	<b>Loss of Future Income</b>	<b>Past Medical Expenses<sup>1</sup></b>	<b>Future Medical Expenses</b>
Mark I. Sokolow	N/A	N/A	N/A	Expert
Rena M. Sokolow	N/A	N/A	N/A	Expert
Jamie A. Sokolow	N/A	N/A	N/A	Expert
Lauren M. Sokolow	N/A	N/A	N/A	Expert
Elana R. Sokolow	N/A	N/A	N/A	N/A
Shayna E. Gould	Expert	Expert	N/A	Expert
Ronald A. Gould	N/A	N/A	N/A	N/A
Elise J. Gould	N/A	Expert	N/A	Expert
Jessica Rine	N/A	N/A	N/A	N/A
Shmuel Waldman	Expert	Expert	N/A	Expert
Henna N. Waldman	Expert	Expert	N/A	N/A
Morris Waldman	N/A	N/A	N/A	N/A
Eva Waldman	N/A	N/A	N/A	N/A
Dr. Alan J. Bauer	N/A	N/A	N/A	Expert
Revital Bauer	N/A	N/A	N/A	Expert
Yehonathon Bauer	N/A	Expert	N/A	Expert
Binyamin Bauer	N/A	N/A	N/A	N/A
Daniel Bauer	N/A	N/A	N/A	N/A
Yehuda Bauer	N/A	N/A	N/A	N/A
Leonard Mandelkorn	N/A	N/A	N/A	N/A
Shaul Mandelkorn	Expert	Expert	N/A	Expert
Nurit Mandelkorn	N/A	N/A	N/A	N/A
Oz Joseph Guetta	Expert	Expert	N/A	Expert
Varda Guetta	N/A	N/A	N/A	Expert
Robert L. Coulter Sr.	N/A	N/A	N/A	N/A
Estate of Janis Ruth Coulter	N/A	Expert	N/A	N/A
Dianne Coulter Miller	N/A	N/A	N/A	N/A
Robert L. Coulter Jr.	N/A	N/A	N/A	N/A
Dr. Larry Carter	N/A	N/A	N/A	N/A
Estate of Diane Carter	N/A	Expert	N/A	N/A
Shaun Coffel	N/A	N/A	N/A	N/A
Dr. Richard Blutstein	N/A	N/A	N/A	Expert
Estate of Benjamin Blutstein	N/A	Expert	N/A	N/A
Dr. Katherine Baker	N/A	N/A	See note 2	Expert

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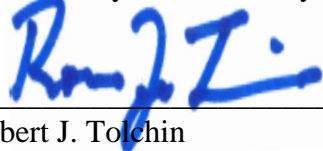
<sup>1</sup> “Medical expenses” means expenses for any medical, hospital, psychiatric and/or psychological treatment, service, device, medication or product.

Rebekah Blutstein	N/A	N/A	See note 3	Expert
Norman Gritz	N/A	N/A	N/A	N/A
Estate of David Gritz	N/A	Expert	N/A	N/A
Nevenka Gritz	N/A	N/A	N/A	Expert
Karen Goldberg	Expert	Expert	N/A	Expert
Estate of Stuart Scott Goldberg	N/A	Expert	N/A	N/A
Chana B. Goldberg	N/A	Expert	N/A	Expert
Esther Z. Goldberg	N/A	Expert	N/A	Expert
Yitzhak S. Goldberg	N/A	Expert		Expert
Shoshana M. Goldberg	N/A	Expert	N/A	Expert
Eliezer S. Goldberg	N/A	Expert	N/A	Expert
Yaakov M. Goldberg	N/A	Expert	N/A	Expert
Tzvi Y. Goldberg	N/A	Expert	N/A	Expert

Plaintiffs reserve the right to supplement and/or modify the information above as required and/or permitted by the Federal Rules of Civil Procedure and the Local Rules.

February 6, 2012

Plaintiffs, by their Attorney,



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<sup>2</sup> Dr. Baker is claiming \$4,605 in past medical expenses. That claim has been calculated by adding the amounts reflected in the receipts for medical care produced to defendants on February 2, 2012.

<sup>3</sup> Ms. Blutstein is claiming \$5,075 in past medical expenses. That claim has been calculated by adding the amounts reflected in the receipts for medical care produced to defendants on February 2, 2012.



**CERTIFICATION**

I hereby certify that on February 6, 2012, I served the within by U.S. mail and electronic mail on the counsel listed below.

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Robert J. Tolchin